

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**GILBERTO CASTRO NIEVES
LILIA MARIA MUNOZ VINUEZA
DEBTOR(S)**

CASE NO. 10-01579 ESL

CHAPTER 13

OBJECTION TO CLAIM #8 FILED BY CRIM

TO THE HONORABLE COURT:

Comes now Debtors, represented by the undersigned attorney, and respectfully STATE,
ALLEGE and PRAY:

1. On March 29, 2010, creditor “Centro de Recaudación Municipal de Impuestos Municipal de Impuestos” (CRIM) filed Proof of Claim #8 for property taxes in the total amount of \$37,572.04, bifurcated in a secured portion of \$34,023.94 and an unsecured portion of \$3,548.10.

2. CRIM’s claim #8 corresponds to Real Estate owned by Plaza Las Americas, Inc.

3. Debtors do not have and never had an ownership interest over said property, nor the obligation to the pay property taxes claimed, in lieu of the property owners.

4. Debtors allege lack of specificity in the information and documentation in support of Claim #8 to establish an obligation connecting Debtors as the responsible parties in interest in connection with the debt claimed.

5. Debtors allege and submit that the party responsible for to pay the taxes claimed by Claim #8 is the owner of such property, Plaza Las Americas Inc..

WHEREFORE the undersigned attorney for Debtor requests from this Honorable Court to disallow Claim #8 in its entirety, as is not an obligation of the herein Debtors.

Case No. 10-01579 ESL
Page 2

NOTICE

Parties in interest are hereby granted thirty (30) days from the date of notice to oppose the motion and request a hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed the Court will schedule the motion for a hearing as contested matter.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all CM/ECF participants who registered for receipt of notice by electronic mail, particularly to Alejandro Oliveras Rivera, Chapter 13 Trustee. I further certify that the foregoing has been served to the U.S. Trustee at ustpregion21.hr.ecf@usdoj.gov.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, January 5, 2011.

s/JOSE L. JIMENEZ QUINONES
José L. Jiménez Quiñones, Esq.
USDCPR 203808
268 AVE. PONCE DE LEON
Suite 1118
San Juan, P.R. 00918-2007
TEL: 787-282-9009
FAX: 1 (866) 326-9416 & 787-282-2009
jimenezlawoffice@gmail.com